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NAME OF COMMITTEE (In Full)  
Employees of Northrop Grumman Corporation PAC

FEC IDENTIFICATION NUMBER

C00088591

Mailing Address 2980 Fairview Park Drive

City	State	ZIP Code
Falls Church	VA	22042

September 20, 2018

Ms. Maureen Benitz  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

Re: July Monthly Report (06/01/2018 - 06/30/2018)

This letter responds to your Request for Additional Information (RAI) dated 8/28/2018. Your inquiry raised a question about contributions to BACKPAC made by our PAC and by the Orbital ATK Inc. Political Action Committee.

As you know, ENGPAC filed an Amended Statement of Organization on 6/19/2018 to disclose affiliation with the Orbital ATK Inc. Political Action Committee (OAPAC) as a result of the acquisition of Orbital ATK Inc. by Northrop Grumman Corporation. We immediately requested historical data from the OAPAC so that we could integrate both PACs' disbursement history together for purposes of reviewing future contributions under the combined limits for affiliated PACs. Unfortunately a review of our records indicates that in the process of entry of the OAPAC history into our database, there was a short overlap between when new checks were written and when the historical contributions for BACKPAC were entered and audited, resulting in the \$5000 check from ENGPAC written on 6/28/2018. This contribution, when combined with the previous OAPAC contributions, did exceed the annual limit for PAC to PAC contributions.

ENGPAC requested a refund from BACKPAC in writing on 9/5/2018 and received the refund on 9/10/18. The refund was deposited into our PAC account on 9/14/18, and it will be disclosed on the October Monthly Report. Northrop Grumman and ENGPAC take all applicable Federal, State and Local campaign finance regulations seriously. Our vendor has reviewed the OAPAC history now housed together with the ENGPAC history and has reviewed all contributions written since the affiliation took place. We have confirmed that no other inadvertent excessive contributions have been made, and we do not anticipate any in the future.

We feel that this response and the upcoming disclosure of the refund from BACKPAC adequately responds to your inquiry. However, should you need additional information, please feel free to contact Ken Davis at (703)476-3070 or Jennifer Brooks at (703)280-3047.

Respectfully,

John Koehn, Treasurer  
Employees of Northrop Grumman Corporation PAC (ENGPAC)